

SERFF Tracking Number:	AXAF-126991844	State:	Arkansas
Filing Company:	AXA Equitable Life Insurance Company	State Tracking Number:	47734
Company Tracking Number:			
TOI:	H16I Individual Health - Major Medical	Sub-TOI:	H16I.005C Individual - Other
Product Name:	LMM_BMM		
Project Name/Number:	LMM BMM no Limits AR/2010PP6		

Filing at a Glance

Company: AXA Equitable Life Insurance Company

Product Name: LMM_BMM

SERFF Tr Num: AXAF-126991844 State: Arkansas

TOI: H16I Individual Health - Major Medical

SERFF Status: Closed-

State Tr Num: 47734

Disapproved

Sub-TOI: H16I.005C Individual - Other

Co Tr Num:

State Status: Disapproved-Closed

Filing Type: Rate

Reviewer(s): Rosalind Minor

Author: Samuel Gut

Disposition Date: 02/07/2011

Date Submitted: 01/18/2011

Disposition Status: Disapproved

Implementation Date Requested: On Approval

Implementation Date:

State Filing Description:

General Information

Project Name: LMM BMM no Limits AR

Status of Filing in Domicile: Authorized

Project Number: 2010PP6

Date Approved in Domicile: 12/06/2010

Requested Filing Mode: Review & Approval

Domicile Status Comments:

Explanation for Combination/Other:

Market Type: Individual

Submission Type: New Submission

Individual Market Type: Individual

Overall Rate Impact: 10%

Filing Status Changed: 02/07/2011

State Status Changed: 02/07/2011

Deemer Date:

Created By: Samuel Gut

Submitted By: Samuel Gut

Corresponding Filing Tracking Number:

PPACA: Grandfathered Immed Mkt Reforms

PPACA Notes: null

Filing Description:

The new federal health care reform law (PPACA) requires us to provide benefits with no lifetime limits to policyholders covered by the law. As a consequence of this mandate, policyholders who formerly had different lifetime benefit limits, and consequently different premium rates, will now have the same lifetime benefits, viz., unlimited lifetime benefits. Our concern is that policyholders with the same lifetime benefits but different premium rates, may violate the state antidiscrimination laws. And yet immediately raising the rates of the policyholders who formerly had the lower benefit limits to equal those of the policyholders who formerly had the higher benefit limits, could result in a number of instances in a drastic one time increase and a hardship to the former class of policyholders. Our proposal is to phase in the equalization of rates in 20% annual increments (compounded annually) so as not to impose an undue burden on any of our policyholders. Implementing this proposal would equalize the rates among practically all similarly situated

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 policyholders within five or fewer years.

The Company has the greatest number of policyholders with forms with this benefit structure in New York State. The New York State Insurance Department has agreed to our proposal, and we will begin implementing it for our New York insureds shortly. Your concurrence with our proposal would enhance our ability to treat similarly situated policyholders in a similar manner on a nationwide basis

Company and Contact

Filing Contact Information

Samuel Gut, Assistant Actuary samuel.gut@axa-equitable.com
 1290 AVENUE OF THE AMERICAS 201-743-5047 [Phone]
 11TH FLOOR
 NEW YORK, NY 10104

Filing Company Information

AXA Equitable Life Insurance Company	CoCode: 62944	State of Domicile: New York
1290 Avenue of the Americas	Group Code: 968	Company Type: Insurance
New York, NY 10104	Group Name:	State ID Number:
(212) 314-4023 ext. [Phone]	FEIN Number: 13-5570651	

Filing Fees

Fee Required? Yes
 Fee Amount: \$50.00
 Retaliatory? No
 Fee Explanation:
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
AXA Equitable Life Insurance Company	\$50.00	01/18/2011	43876380

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Disapproved	Rosalind Minor	02/07/2011	02/07/2011
Objection Letters and Response Letters			

Objection Letters				Response Letters		
Status	Created By	Created On	Date Submitted	Responded By	Created On	Date Submitted
Pending	Rosalind Minor	01/24/2011	01/24/2011	Samuel Gut	02/03/2011	02/03/2011
Industry Response						

SERFF Tracking Number:	AXAF-126991844	State:	Arkansas
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Disposition

Disposition Date: 02/07/2011

Implementation Date:

Status: Disapproved

HHS Status: HHS Denied

State Review: Reviewed by Actuary

Comment:

It is the primary mission of the Arkansas Insurance Department to protect consumers.

Given the current state of the economy, the number of past increases on this block of business and the fact that the Arkansas experience is not credible, our Department is disapproving your request for a rate increase on this submission.

We appreciate your understanding and cooperation in this matter.

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where required):	Minimum % Change (where required):
AXA Equitable Life Insurance Company	10.000%	10.000%	\$980	1	\$9,930	20.000%	3.000%
Percent Change Approved:							

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Minimum:	%	Maximum:	%
		Weighted Average:	%

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Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Health - Actuarial Justification	Disapproved	No
Supporting Document	Rate Pages	Disapproved	No
Supporting Document	Arkansas Rate Increase History	Disapproved	Yes

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Objection Letter

Objection Letter Status Pending Industry Response

Objection Letter Date 01/24/2011

Submitted Date 01/24/2011

Respond By Date

Dear Samuel Gut,

This will acknowledge receipt of the captioned filing.

Objection 1

- Health - Actuarial Justification (Supporting Document)

Comment:

Please provide the history of the rate increases in Arkansas.

Also, the rate tab indicates that there is one policyholder in Arkansas. What percentage of increase will this policyholder receive? Is it a one time increase or will it be implemented over the next few years?

Please feel free to contact me if you have questions.

Sincerely,

Rosalind Minor

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Response Letter

Response Letter Status Submitted to State
Response Letter Date 02/03/2011
Submitted Date 02/03/2011

Dear Rosalind Minor,

Comments:

Thank you for your letter of January 24.

Response 1

Comments: I have attached the rate increase history for Arkanasa. The one policyholders that is affected, has an LMM with a \$15,000 benefit limit. We are planning to ultimately bring him to the same premium level as the \$60,000 benefit limit is now paying. That amounts to an increase of over 48%. However, we are implementing it over time, with a maximum increase of 20% per year.

Related Objection 1

Applies To:

- Health - Actuarial Justification (Supporting Document)

Comment:

Please provide the history of the rate increases in Arkansas.

Also, the rate tab indicates that there is one policyholder in Arkansas. What percentage of increase will this policyholder receive? Is it a one time increase or will it be implemented over the next few years?

Changed Items:

Supporting Document Schedule Item Changes

Satisfied -Name: Arkansas Rate Increase History

Comment:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

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Thank you for your prompt attention to this matter.

Sincerely,
Samuel Gut

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Rate Information

Rate data applies to filing.

Filing Method:	SERFF
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	10.000%
Effective Date of Last Rate Revision:	10/30/2009
Filing Method of Last Filing:	Paper

Company Rate Information

Company Name:	Company Rate Change:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where required):	Minimum % Change (where required):
AXA Equitable Life Insurance Company	Increase	10.000%	10.000%	\$980	1	\$9,930	20.000%	3.000%
Product Type:	HMO	PPO	EPO	POS	HSA	HDHP	FFS	Other
Covered Lives:								7
Policy Holders:								4

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Rate Review Details

COMPANY:

Company Name: AXA Equitable Life Insurance Company

HHS Insurer Id:

Product Names:

Trend Factors:

FORMS:

New Policy Forms:

Affected Forms:

Other Affected Forms:

REQUESTED RATE CHANGE

INFORMATION:

Change Period:

Member Months:

Benefit Change:

Percent Change Requested: Min: Max: Avg:

PRIOR RATE:

Total Earned Premium:

Total Incurred Claims:

Annual \$: Min: Max: Avg:

REQUESTED RATE:

Projected Earned Premium:

Projected Incurred Claims:

Annual \$: Min: Max: Avg:

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<i>Project Name/Number:</i>	<i>LMM BMM no Limits AR/2010PP6</i>		

Supporting Document Schedules

		Item Status:	Status
			Date:
Satisfied - Item:	Arkansas Rate Increase History	Disapproved	02/07/2011
Comments:			
Attachment:			
LMM RI Hist.pdf			

ACTUARIAL MEMORANDUM
AXA Equitable Life Insurance Company
Policy Form LMM

IV. History of Previous Rate Revisions

Previous rate increases since 1986 are summarized below. These are the rate increases applied in Arkansas.

Table 3: Rate Revision History

Effective Date	Rate Increase
7/15/1986	10.0%
7/15/1987	14.0%
7/15/1988	11.0%
7/15/1989	11.0%
7/15/1990	9.0%
7/15/1991	11.0%
7/15/1992	13.0%
7/15/1993	11.0%
8/8/1994	10.0%
7/18/1995	10.0%
8/13/1996	10.0%
7/17/2001	8.0%
8/18/2003	20.0%
10/5/2004	10.0%
10/30/2005	20.0%
10/30/2006	20.0%
10/30/2009	10.0%